# Case 3:23-cv-00782-G-BH Doctmen 30 Take 004/03/23 Page 1 of 17 PageID 5 UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DISTRICT COURT

2023 APR 13 PM 1:51



•	Kimberly	IC.L	es	reatte	
P	aintiff				

Plaintiff	
v.	Civil Action No.
RAPHAEL GIRA NATALIE N	JANE AND JOHN DOELS)  TANKE AND JOHN DOELS)  TROONI JEFF HOUSTON CONTROLOR HMS HOST  NUVILLE SAMUEL HOUSTON CONTROLOR HMS HOST  JOHNNA JACKSON COMPACION, HMS HOST  COMPLAINT - CIVIN RIGHTS ACTION WITH A JURYER  LEDARTE PRESENTS HER COMPLAINT FOR UNLAWFUL  OLATION OF AZ U.S. C.S. 19818198381985 (2) (3) AND 8 1981  TON OF TITLE VII OF CIVIN RIGHTS ACT OF 1964 (TITLE VII)  F THE AMERICANS WITH DISABILITIES ACT OF 1990(ADA)  DENIAL OF EQUAL PROTECTION AND TREATMENT OF THE  ACTY TO VIOLATE CIVIL RIGHTS WHILE ACTING UNDER  LOWING WORKPLACE VIOLENCE.  ANTHORIZED AND INSTITUTED PURSUANT TO THE CIVIL  42 USS, \$ 2201 AND 2202  WET HAS SULISDICTION OVER THIS ACTION PURSUANT TO  343 2242 AND \$1651
* Attach additional pages as need	ed.
	,

Date Signature Kimberly C. Le Death Print Name 7305 EVERGLADE DRIVE Address NORTH RICHLAND HILLS TX. 76182 City, State, Zip 817-706-1724 Telephone

### **Parties**

- 1. At all pertinent times the plaintiff lived at 7305 Everglade Drive N. Richland Hills Tx. 76182
- Defendant American Airlines, Inc. was the employer of the plaintiff at the time of the events
  described in this complaint and is being said it is official and or personal capacity and its address
  is #1 Skyview Dr. MD 8B503 Ft. Worth, Tx 76155
- Defendant Garry White II Sr. Manager Texas Region Premium Guest Services was employed by American Airlines during the time of the events described in this complaint and is being sued in his personal and official capacities.
- 4. Defendant Veronda Butler Sr. Manager Premium Guest Services was employed by American Airlines during the time of the events described in this complaint and id being sued in her personal and official capacities.
- Defendant Sarah Mahood, Guest Experience Manager DFW/PGS was employed by American Airlines during the time of the events described in this complaint and is being sued in her personal and official capacities.
- Defendant Natalie Neuville Premium Guest Services Manager DFW was employed by American
  Airlines during the time of the events described in this complaint and is being sued in her
  personal and official capacities.
- 7. Defendant Raphael Girardoni Managing Director Premium Guest Services was employed by American Airlines during the time of the events described in this complaint and is being sued in his personal and official capacities.
- Amanda Beaman Sr. Specialist, Team Member Relations DFW was employed by American
  Airlines during the time of the events described in this complaint and is being sued in her
  personal and official capacities.
- Kerrian Palmer Sr. Specialist, Team Member Relations DFW was employed by American Airlines during the time of the events described in this complaint and is being sued in her personal and official capacities.
- 10. Maxwell Roesh Contractor/HMS Host was employed by American Airlines during the time of the events described in this complaint and is being sued in his personal and official capacities.
- 11. Joanna Jackson Contractor/HMS Host was employed by American Airlines during the time of the events described in this complaint and is being sued in her personal and official capacities.
- 12. Jeff Houston Contractor/HMS Host was employed by American Airlines during the time of the events described in this complaint and is being sued in his personal and official capacities.

13. Samuel Houston Contractor/HMS Host was employed by American Airlines during the time of the events described in this complaint and is being sued in his personal and official capacities.

### **Failure To Adhere and Enforce Policies**

- 14. American Airlines has written rigorous policies for the purpose of following laws against discrimination, retaliation, American Disability Act and workplace violence.
- 15. American Airlines violated its own policies by discriminating, retaliating, not adhering to ADA (American Disability Act) and allowing workplace violence against Ms. LeDeatte.
- 16. American Airlines has several avenues to report discrimination and workplace violence including reporting anonymously.
- 17. American Airlines knows policies do not enforce themselves.
- 18. American Airlines policy is clear about protecting employees.
- 19. American Airlines refused to give Ms. LeDeatte a hearing or a coach and counseling session prior to issuing a level one (Disciplinary Action).
- 20. Many other employees in this department have complained about discrimination and workplace violence.
- 21. American Airlines failed to supervise its managers to ensure they follow policies and procedures prohibiting discrimination, retaliation, ADA (Disability) workplace violence laws.
- 22. American Airlines failed to adequately train its managers to follow policies for ADA (American Disability Act) discrimination and workplace violence.
- 23. American Airlines hires Team Member Relations personnel who are not qualified to follow policies prohibiting discrimination, retaliation, workplace violence and ADA (American Disability Act).
- 24. American Airlines refused to gather all the facts.

- 25. American Airlines managers do recognize discrimination if someone makes a racist comment, but managers are not trained to look for signs of discrimination absent racial comments.
- 26. The Plaintiff Ms. LeDeatte was hired at American Airlines in September 1987 as a Customer Service Representative. She transferred to Premium Services in 2001. Ms. LeDeatte seniority was higher than Garry White II amongst others which meant Ms. LeDeatte would be able to bid her scheduled shift, days off and vacation prior to Garry White II being able to bid for his scheduled shift, days off and vacation. This upset Garry White II as he was bumped in seniority. Scheduled shifts, days off and vacations are bid by seniority in Premium Services. Seniority is everything.
- 27. In 2002 Garry White II was the manning coordinator (Scheduling). He intentionally bypassed Ms. LeDeatte for overtime. When Ms. LeDeatte brought this to Garry White II attention. He replied, "You can get the overtime next time".
- 28. Ms. LeDeatte filed a grievance of which was found with merit. This did not sit well with Garry White II. Ms. LeDeatte was warned by her colleagues that Garry White II is very vindictive and would eventually get her back.
- 29. July 2012 April 2017 Garry White II was promoted to Guest Experience Manager. Whenever Ms. LeDeatte reached out to Garry White II to advise when employees were not adequately trained and not giving our passengers the premium service, they deserve. He would always make excuses as to why he could not address the complaint or simply ignore Ms. LeDeatte emails.

### Claim 1

- 30. In the year 2020 Garry White II was promoted to Sr. Manager of Premium Services Texas region, which gave him more power. Garry White II immediately changed Ms. LeDeatte work location without any prior notification which is a prerequisite. This is a disregard to Ms. LeDeatte seniority, more importantly part of the CWA Union agreement/contract. Ms. LeDeatte looked at her work location and it had been changed. When asked about the change Garry White explained as a Sr. Manager, he could move her at any time. Which is not accurate do to there were other employees with less seniority that should have been moved to a different location. Garry White advised Ms. LeDeatte that she could grieve the movement if she wanted to.
- 31. The grievance process can take up to 30 days to be found with or without merit. Ms. LeDeatte filed a grievance of which was found with merit. Ms. LeDeatte was forced to work a different scheduled shift and location due to Garry White retaliation.
- 32. Garry White II immediately started showing favoritism to co-workers with lesser seniority than Ms. LeDeatte. Example: He manipulated the work schedule by granting part timers with less
- 33. seniority better days off with favorable shifts. Including Thanksgiving and the day after,
  Christmas Day, the day after, New Years Eve along with New Years Day. As Ms. LeDeatte was

- 34. forced to wait for the company to grant Christmas Day off which is based on the passenger's daily load factor. Another disregard of employee seniority.
- 35. December 2020, plaintiff fearing for her livelihood and some of her colleagues (all of which had 30+ years seniority) requested a meeting with Garry White II and Sarah Mahood. Garry White II did not schedule the requested meeting for 2 weeks (stall tactic).

# Claim 2 Due Process Violation and ADA Violation

- 36. American Airlines was made aware that plaintiff suffers from migraines on 11/20/2008.
- 37. In the meeting, Ms. LeDeatte explained to Garry White II and Sarah Mahood that she along with others present were mentally and physically ill due to the discrimination we were receiving along with lack of care for their well-being. Moreover, some employees along with the plainiff have needed to take additional medication. Furthermore, the work environment is causing plainiff anxiety, depression and triggering migraines. The work environment had become toxic and hostile. Management was pitting full timers against part time employees (High vs Low seniority). The part timers that had bid open time had much less seniority than all of the full-time employees. The plainiff asked Garry White II and Sarah Mahood for the discriminatory behavior to cease immediately. Garry White II replied per the company treat each other fairly with respect including me. Appearing unbothered and said he doesn't have time to keep meeting with us. At that point Ms. LeDeatte realized Garry White II was vindictive and retaliatory while clothed with authority to carry out his willful malicious intent to retaliate upon the plaintiff.
- 38. Sarah Mahood stated she could tell there are raw emotions. She had done bids in smaller stations but lacked bid experience in a HUB with open time. The plaintiff requested shifts with better days off as she was so entitled due to her seniority. Also offered to assist Sarah Mahood in creating [A] working shift bid. Due to her experience along with her colleague who had 14 years' experience in scheduling and shift bids. Which Sarah Mahood agreed to at that time.
- 39. At Sarah Mahoods request plaintiff gave her a shift bid. However, once plaintiff afforded Sarah Mahood with the shift bid. She ignored it, instead issued an additional bias bid. Stating plantiffs bid failed to work for the operation.
- 40. {Relations back} to the point Garry White II had such experience but remained willfully indifferent.

- 41. Plaintiff at this point started experiencing back and arm pain, migraines, face started to break out, emotional and mental distress and anguish.
- 42. March 2, 2021, defendant Sarah Mahood summoned plaintiff to her office with allegations of plaintiff making an offensive racial statement to a black passenger. Also stated she had a witness to the alleged statement without naming the so-called witness or gathering a statement from the passenger whom plaintiff supposedly made statement to. The passenger in question did not make a complaint.

### **Disciplinary Action**

- 43. Also, on March 2, 2021, plaintiff was issued a level 1 which is disciplinary action for the unsubstantiated allegations.
- 44. Sarah Mahood advised she did not know anything about the level. She was only doing what she had been instructed to do by Human Resources. However, Sarah Mahood would not name the personnel that ordered her to discipline the plaintiff. Instead advised plaintiff to speak with Human Resources as they were the ones that advised her to issue the level 1 disciplinary action letter.
- 45. Upon speaking with Amanda Beaman/Human Resources it was discovered that Amanda Beaman did not instruct Sarah Mahood to issue the level 1 disciplinary action.
- 46. There was no due process in this unsubstantiated discipline to plaintiff. Moreover, the complaint should not have been leveled against plaintiff. Which triggered plaintiff's migraine headaches to flare, emotional distress, mental anguish and caused plaintiff's thinking to be affected. Triggering loss of sleep, anxiety and panic attacks. Furthermore, affected plaintiff's filial relationships.

### **Equal Protection/Treatment**

- 47. In 2021 a white colleague returned to work from an IOD (Injury on Duty). She was allowed to bid on a shift and days off based off her seniority per the CWA contract, but her location was variable. Which meant she could not bid on a specific location because she was out on IOD when the bidding process began and could possibly be moved daily per operational needs. The white colleague was patrial to working in terminal D and Garry White II, Sarah Mahood and Natalie Neuville moved other colleagues that bid terminal D were moved to other work locations to allow my white colleague to remain in terminal D.
- 48. Corporations must not discriminate against people because of race.

- 49. American Airlines did not evaluate Ms. LeDeatte as the same as her peers when issuing discipline.
- 50. Ms. LeDeatte was performing as good or better than her peers. The difference is she is black.
- 51. Garry White II advised Ms. LeDeatte that it was OK for her to use profanity in a hearing that he was the chairperson to make her point.
- 52. Ms. Neuville called Ms. LeDeatte out of her name more than once.
- 53. Ms. LeDeatte was subjected to ridicule, insults and improper conduct based on her race.
- 54. American Airlines knew or should have known of the harassment but took no prompt remedial action.
- 55. Ms. LeDeatte to a protected group and was subjected to unwelcome harassment based on her race.
- 56. The continued harassment over the years was severe and humiliating.
- 57. As long as this adverse treatment went on shows American Airlines had multiple meetings of the mind to make Ms. LeDeatte suffer and violated her rights.
- 58. American Airlines white employees are subjected to less harsh punishment than black and Latino employees.
- 59. White employees were allowed to physically assault a black person or persons without harsh punishment.
- 60. American Airlines knew or should have known that its white employees were discriminating against black and Latino's and should have taken corrective action to change the behavior and prevent the discrimination within its control.

- 61. The harassment was severe and pervasive, interfering with the terms and conditions of plaintiff's employment. The disparaging racial treatment or other malice conduct was unwelcome, undesirable and offensive to Ms. LeDeatte.
- 62. Ms. LeDeatte escalated the hostility on many occasions to American Airlines and made reasonable efforts to prevent a hostile work environment.
- 63. The harassment was continual, obscene, obnoxious and shocking to the conscious of the ordinary person.
- 64. A reasonable person would find that the harassment fostered and was an abusive working environment.
- 65. Employees of American Airlines participated in the harassment of Ms. LeDeatte.
- 66. American Airlines treated Ms. LeDeatte resentfully after she openly reported unwanted discrimination.

### Safety

- 67. American Airlines and HMS Host (Contractor) were advised on several occasions that many of Host employees were a threat to American Airlines employees specifically Ms. LeDeatte.
- 68. Ms. LeDeatte was assaulted by one of the HMS host employees and no immediate action was taken against the employee.
- 69. Ms. LeDeatte reported verbal altercations with Host to American Airlines.
- 70. American Airlines stated we were safe once inside security. Contrary to HMS Host employees having access to knives once inside security and inside the kitchen.
- 71. HMS Host and American Airlines cooked on a dirty panini grill and lack of ventilation causing a burning foul odor inside Ms. LeDeatte work area which was triggering her migraines.
- 72. Instead of American Airlines and HMS Host taking remedial action. When Ms. LeDeatte reported the problem to HMS Host and American Airlines. Her complaint was not taken seriously. The smells continued causing Ms. LeDeatte to increase her medication.

### **American Airlines Is a Global Airline**

73. American Airlines brings people of all races, ethnicities and back grounds together. American Airlines states "We believe Black Lives Matter. We know there is more work to do to achieve racial and equity in our society, and we remain committed to the journey. Contrary to this American Airlines continues to stage so called listening sessions. Without any real solutions.

### **Exemplary Damages**

74. Ms. LeDeatte is also entitled to receive punitive damages because American Airlines engaged in a discriminatory or retaliatory practice or in discriminatory or retaliatory practices with malice or with reckless indifference to the federally protected rights of an aggrieved individual.

### **Compensatory and Equitable Relief**

- 75. Ms. LeDeatte sustained damages, including lost wages, emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, and other nonpecuniary losses for which she is entitled to recovery under causes of action.
- 76. Ms. LeDeatte is also entitled to declaratory relief that a violation has occurred.
- 77. Ms. LeDeatte is also entitled to equitable relief in the form of an injunction against future discrimination or retaliation.

### **Title VII Violation**

- 78. Ms. LeDeatte filed an administrative charge with the Equal Employment Opportunity Commission (EEOC). Ms. LeDeatte exhausted her administrative remedies with the EEOC and received the right to sue.
- 79. American Airlines employs well over 15 employees and therefore qualifies as an employer under Title VII.

- 80. American Airlines treated Ms. LeDeatte adversely because she reported and opposed unlawful discrimination, retaliation and because she filed an EEOC charge.
- 81. American Airlines actions violate the Civil Rights Act of f1964, 42 U.S.C, & 2000e, et seq., which prohibits retaliation against any person because the person has opposed any practices forbidden under Title VII or because the person has filed a complaint, testified, or assisted in any proceeding under Title VII.
- 82. The retaliation motivated American Airlines continuing harassment, hostile work environment, and disregard to American Disabilities Act.



MENU

All Places > Policies > Domestic U.S. policies > Documents

**POLICY** 

### No Intimidation/No Violence

Created by Policy Admin on Nov 29, 2018 10:21 AM

7 minute read

This policy applies to everyone working on behalf of the company in the U.S., including but not limited to, regular domestic team members, contract workers, temporary workers and non-team members on American's property. American prohibits discrimination, harassment, retaliation, threats and workplace violence against our team members, contractors, subcontractors, vendors, consultants, temporary workers or anyone else on our property.

Internationally based team members should refer to the policies for their region.

No one wants to work for a company where harassment, intimidation or violence lives. To be absolutely clear, American prohibits threats and workplace violence toward our team members, vendors, or anyone on our property. In no shape or form will the following be tolerated:

- Physically or verbally threatening or intimidating another individual while at work, including acts of bullying;
- The intentional destruction or threat of destruction of company or another's property;
- Harassing or threatening a team member while at work, including phone calls or written communications;
- Stalking at work; and
- Advocating illegal use of firearms, bombs, or weapons while at work.

If you witness or are aware of any violent or potentially violent or intimidating conduct, do the right thing and report it to your local management as quickly as possible. They'll take it from there, making an initial assessment of the situation and contacting the People Department as needed.

### How to report discrimination, harassment, retaliation, threats or workplace violence

We can't stress it enough. American does not tolerate discrimination, harassment, retaliation for making a complaint of discrimination or harassment, or participating in an investigation of such a complaint, threats or workplace violence. If you feel that you have been harassed, discriminated, retaliated against in the employment or accommodation process, threatened or experienced workplace violence, report it.

Here is how to report it;

Tell your manager

Contact your People Business Partner

- MENU
- Or contact the Helpline by phone 1-877-422-3844 or online EthicsPoint Helpline (you may choose to remain anonymous)

If you chose to remain anonymous, you will be assigned a pin number so that you can check back to provide more information and so that we can follow up with you if we need more information.

Click here for a link to a copy of the EthicsPoint Helpline complaint form

All good faith complaints will be timely and impartially investigated, and appropriate action will be taken to prevent and promptly correct any inappropriate behavior. To the extent possible, we will investigate complaints with due regard for privacy and confidentiality of all persons involved. Complete confidentiality may not be possible in all circumstances, however. During the investigation, we generally will interview the complainant and the accused, conduct further interviews as necessary, and review any relevant documents or other information. Team members must cooperate with our investigation. Upon completion of the investigation, we will determine whether company policy has been violated based upon our reasonable evaluation of the information gathered during the investigation. We will inform the complainant of the results of the investigation.

We also will take prompt and appropriate corrective action to stop misconduct and prevent its recurrence, if we determine such measures are necessary. As circumstances warrant, this corrective action may include warning, counseling, transfer, suspension, or termination. Anyone found engaging in or condoning intimidation or violence in violation of this policy, including managers and supervisors, and regardless of position or title, will be subject to discipline, up to and including termination.

We won't retaliate or otherwise hold complaints made in good faith against a team member who reports inappropriate conduct or participates in an investigation of such conduct. Remember, it is everyone's job to report intimidation or violence and to cooperate in the company's investigation of such reports.

Together, we have the opportunity to create a safe and inviting place to work, a workplace that sets us apart.

#### **Resources:**

- Work Environment PDF
- Work Environment Policy
- No Discrimination/No Harassment
- No Sexual Harassment
- No Retaliation
- Investigations
- A Message for Our Leaders
- Federal and state resources



MENU

All Places > Policies > Domestic U.S. policies > Documents

POLICY

### No Retaliation

Created by Policy Admin on Nov 29, 2018 10:50 AM

6 minute read

This policy applies to everyone working on behalf of the company in the U.S., including but not limited to, regular domestic team members, contract workers, temporary workers and non-team members on American's property. American prohibits discrimination, harassment, retaliation, threats and workplace violence against our team members, contractors, subcontractors, vendors, consultants, temporary workers or anyone else on our property.

Internationally based team members should refer to the policies for their region.

American encourages all team members to report any conduct they believe is discriminatory or harassing. American will not retaliate against any team member who reports in good faith such conduct, participates in an investigation of such conduct, or testifies or assists in any related legal proceeding. If you believe another team member is retaliating against someone for reporting inappropriate conduct or participating in an investigation of such conduct, report it.

# How to report discrimination, harassment, retaliation, threats or workplace violence

We can't stress it enough. American does not tolerate discrimination, harassment, retaliation for making a complaint of discrimination or harassment, or participating in an investigation of such a complaint, threats or workplace violence. If you feel that you have been harassed, discriminated, retaliated against in the employment or accommodation process, threatened or experienced workplace violence, report it.

Here is how to report it;

- Tell your manager
- Contact your People Business Partner
- Or contact the EthicsPoint Helpline by phone 1-877-422-3844 or online at www.aa.ethicspoint.com. (You may choose to remain anonymous)

If you chose to remain anonymous, you will be assigned a pin number so that you can check back to provide more information and so that we can follow up with you if we need more information.

Click here for a link to a copy of the EthicsPoint Helpline complaint form

All good faith complaints will be timely and impartially investigated, and appropriate action will be taken to prevent and promptly correct any inappropriate behavior. To the extent possible, we will

### Case 3:23-cv-00782-G-BH Document 3 Filed 04/13/23 Page 14 of 17 PageID 18

Complete confidentiality may not be possible in all circumstances, however During the investigation, we generally will interview the complainant and the accused, conduct further interviews as necessary, and review any relevant documents or other information. Team members must cooperate with our investigation. Upon completion of the investigation, we will determine whether company policy has been violated based upon our reasonable evaluation of the information gathered during the investigation. We will inform the complainant of the results of the investigation.

We also will take prompt and appropriate corrective action to stop misconduct and prevent its recurrence, if we determine such measures are necessary. As circumstances warrant, this corrective action may include warning, counseling, transfer, suspension, or termination. Anyone found engaging in or condoning retaliation in violation of this policy, including managers and supervisors, and regardless of position or title, will be subject to discipline, up to and including termination.

We won't retaliate or otherwise hold complaints made in good faith against a team member who reports inappropriate conduct or participates in an investigation of such conduct. Remember, it is everyone's job to report retaliation and to cooperate in the company's investigation of such reports.

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### Resources:

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#### 2517 Views Categories:

Tags: diversity, diversity, race, race, abuse, abuse, discrimination, discrimination, helpline, helpline, complaint, complaint, bullying, bullying, investigation, investigation, work environment, work environment, sexual harassment, investigate, investigate, gender, gender, harassment, harassment, sexual-harassment, report harassment, report harassment, harrassment, harrassment, sexual, bullied, bullied, age, age, hate, hate, racist, racist, retaliation, retaliation, how do i report harassment, how to report harassment, how to report harassment, anonymous report, anonymous report, anonymous, sexual harassment training, sexual harassment training, work environment .pdf, work environment .pdf, discriminate, discriminate

Average User Rating

(O ratings)

oneworld User Agreement Community guidelines Getting started on letnet Tech support

0

MENU

All Places > Policies > Domestic U.S. policies > Documents

### Work Environment Policy

Created by Policy Admin on Nov 22, 2016 3:48 PM

8 minute read

This Work Environment Policy applies to everyone working on behalf of the company in the U.S., including but not limited to, regular domestic team members, contract workers, temporary workers and non-team members on American's property. American prohibits discrimination, harassment, retaliation, threats and workplace violence against our team members, contractors, subcontractors, vendors, consultants, temporary workers or anyone else on our property.

Internationally based team members should refer to the policies for their region. All team members should refer to the Federal and State resources page for state-specific guidance and additional information.

We're a global airline, made up of a diverse workforce. We should celebrate our differences, and nothing less. Respecting one another is a core value of our culture. We will not tolerate discrimination, harassment, bias-related behavior, threats of workplace violence, or other inappropriate behavior. Nor will we tolerate retaliation against anyone who speaks up about, reports, or participates in an investigation involving discrimination, harassment, retaliation, or any inappropriate behavior.

American strictly prohibits discrimination and harassment based on race, color, religion or religious creed, gender, marital status, gender identity, gender expression, sexual orientation, national origin, ancestry, ethnic origin, citizenship, age, military and protected veteran status, genetic information, pregnancy, disability, medical condition or any basis protected by law. Discrimination occurs if you treat someone differently based on one of these protected characteristics.

## How to report discrimination, harassment, retaliation, threats or workplace violence

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- Or contact the Helpline by phone 1-877-422-3844 or online EthicsPoint Helpline (you may choose to remain anonymous)

If you chose to remain anonymous, you will be assigned a pin number so the you can check back provide more information and so that we can follow up with you if we need more information.

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We also will take prompt and appropriate corrective action to stop misconduct and prevent its recurrence, if we determine such measures are necessary. As circumstances warrant, this corrective action may include warning, counseling, transfer, suspension, or termination. Anyone found violating this policy, including managers and supervisors, and regardless of position or title, will be subject to discipline, up to and including termination.

We won't retaliate or otherwise hold complaints made in good faith against a team member who reports inappropriate conduct or participates in an investigation of such conduct. Remember, it is everyone's job to report harassment and to cooperate in the company's investigation of such reports.

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### **Resources:**

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#### 85912 Views Categories:

Tags: policy, diversity, race, abuse, discrimination, helpline, complaint, bullying, investigation, work environment, sexual harassment, harassment and discrimination, investigate, gender, harassment, report harassment, harrassment, 001, sexual, bullied, age, hate, racist, retaliation, how do i report harassment, how to report harassment, anonymous report, anonymous, discriminate

### 

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

purpose of initiating the civil docket sheet. (SEE	INSTRUCTIONS ON NEXT PAGE OF T	THIS FORM.)			
I. (a) PLAINTIFFS KIMBERLY C. LED	ENTE	DEFENDANTS AMERICAN MIRLIAGS, Inc.			
(b) County of Residence of First Listed Plain (EXCEPT IN U.S. ICAL)	ntiff TARRANT		of First Listed Defendant (IN U.S. PLAINTIFF CASES O		
(c) Attorneys (Firm Name, Address, and Telepho	. 1	Attorneys (If Known)  ELLEM PERUL  AMERICAN A  4 5 KYLEM	MI	JEFF T. LESLIE OGLETREE DEAKING 9117 PRESTON ROI SWITCE 500 DAMAS TX. 75225	
II. BASIS OF JURISDICTION (Place	an " CLERVILLES DIE TRICT COUNT NORTHERN DIS RICT OF TEXA			(Place an "X" in One Box for Plaintiff and One Box for Defendant)	
1 U.S. Government Plaintiff (U.S. Go		(For Diversity Cases Only) P Citizen of This State	TF DEF Incorporated or Pr	incipal Place PTF DEF	
2 U.S. Government Diversity Defendant (Indicate	Citizenship of Parties in Item III)	Citizen of Another State	2 Incorporated and I of Business In A		
		Citizen or Subject of a Foreign Country	3 Foreign Nation	66	
IV. NATURE OF SUIT (Place an "X" in C			Click here for: Nature of S		
CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
110 Insurance   120 Marine   130 Miller Act   140 Negotiable Instrument   150 Recovery of Overpayment & Enforcement of Judgment   151 Medicare Act   152 Recovery of Defaulted Student Loans (Excludes Veterans)   153 Recovery of Overpayment of Veteran's Benefits   160 Stockholders' Suits   190 Other Contract   195 Contract Product Liability   196 Franchise   190 Other Contract   195 Franchise   190 Other Contract   195 Contract Product Liability   196 Franchise   230 Rent Lease & Ejectment   240 Torts to Land   245 Tort Product Liability   290 All Other Real Property   445 Amer. w/Di Other   448 Education   440 Employment   448 Education   448 Education   448 Education   440 Employment   440 Employment   440 Employment   440 Employment   440 Emplo	365 Personal Injury - Product Liability   367 Health Care/   Pharmaceutical   Personal Injury - Product Liability   368 Asbestos Personal   Injury Product Liability   PERSONAL PROPERTY   370 Other Fraud   371 Truth in Lending   380 Other Personal   Property Damage   385 Property Damage   385 Property Damage   Truth   Property Damage   385 Property Damage   385 Property Damage   385 Property Damage   510 Motions to Vacate   Sentence   510 Motions to Vacate   Sentence   530 General   535 Death Penalty   Other:   540 Mandamus & Other   550 Civil Rights   555 Prison Condition   560 Civil Detainee - Conditions of	CLABOR  Total Carry and Property 21 USC 881  690 Other  CLABOR  Total Carry and Property 21 USC 881  690 Other  CLABOR  Total Carry and Property 21 USC 881  Act  Total Carry and Property	422 Appeal 28 USC 158 423 Withdrawal 28 USC 157  PROPERTY RIGHTS 820 Copyrights 830 Patent 835 Patent - Abbreviated New Drug Application 840 Trademark 880 Defend Trade Secrets Act of 2016  SOCIAL SECURITY 861 HIA (1395ff) 862 Black Lung (923) 863 DIWC/DIWW (405(g)) 864 SSID Title XVI 865 RSI (405(g))  FEDERAL TAX SUITS 870 Taxes (U.S. Plaintiff or Defendant) 871 IRS—Third Party 26 USC 7609	375 False Claims Act 376 Qui Tam (31 USC 3729(a)) 400 State Reapportionment 410 Antitrust 430 Banks and Banking 450 Commerce 460 Deportation 470 Racketeer Influenced and Corrupt Organizations 480 Consumer Credit (15 USC 1681 or 1692) 485 Telephone Consumer Protection Act 490 Cable/Sat TV 850 Securities/Commodities/ Exchange 890 Other Statutory Actions 891 Agricultural Acts 893 Environmental Matters 895 Freedom of Information Act 896 Arbitration 899 Administrative Procedure Act/Review or Appeal of Agency Decision 950 Constitutionality of State Statutes	
V. ORIGIN (Place an "X" in One Box Only)  Original 2 Removed from State Court	Confinement  3 Remanded from 4 Appellate Court	Reinstated or 5 Transfe Reopened Anothe (specify	r District Litigation		
VI. CAUSE OF ACTION Brief descrip	Civil Statute under which you are find the Count RIGHT'S 42 Unition of cause:	ling (Do not cite jurisdictional state	tutes unless diversity):	5 1986	
VII. REQUESTED IN   CHECK	IF THIS IS A CLASS ACTION RULE 23, F.R.Cv.P.	DEMAND S	CHECK YES only JURY DEMAND:	if demanded in complaint:	
VIII. RELATED CASE(S) IF ANY (See instruc	tions):  JUDGE		DOCKET NUMBER		
DATE	SIGNATURE OF ATTOR	NEY OF RECORD			
FOR OFFICE USE ONLY	· · · · · · · · · · · · · · · · · · ·				
RECEIPT # AMOUNT	APPLYING IFP	JUDGE	MAG. JUI	DGE	